

THE INSTITUTE FOR JUSTICE

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* Applications for admission *pro*
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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

**JENI PEARSONS AND MICHAEL
STORC,**

Plaintiffs,

v.

**UNITED STATES OF AMERICA;
Federal Bureau of Investigation
Special Agent LYNNE ZELLHART,
in her individual capacity; and DOES
1 through 5, Federal Bureau of
Investigation agents in their
individual capacities,**

Defendants.

Case No. 2:23-cv-07952

**PLAINTIFFS' SECOND NOTICE
OF RELATED CASES**

1 Plaintiffs Jeni Pearsons and Michael Storc hereby supplement their earlier
 2 Notice of Related Cases under Local Rule 83-1.3.1 to identify a newly filed case
 3 that is also related to this one. The newly filed was filed in this Court on September
 4 22, 2023: *Donald Leo Mellein v. United States et al.*, No. 2:23-cv-07970.

5 Both this lawsuit and *Mellein v. United States* originated with the
 6 government's March 22, 2021, raid of U.S. Private Vaults (USPV), a private safe-
 7 deposit box company that operated in Beverly Hills, California. Additionally, both
 8 cases seek damages resulting from the government's loss of property that was
 9 stored in the USPV boxes. They therefore raise similar factual questions about the
 10 government's promises to safeguard the property and its failure to do so. They also
 11 raise similar legal questions about the plaintiffs' right to damages resulting from the
 12 government losing their property.

13 Dated: September 22, 2023

Respectfully Submitted,

14
 15 /s/ Lou Egerton-Wiley

16 **INSTITUTE FOR JUSTICE**

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